

March 13, 2014

Subject: Comments to the U.S. Environmental Protection Agency (EPA) Clean Air Scientific Advisory Committee (CASAC) on the Policy Assessment for the Review of the Ozone National Ambient Air Quality Standards (NAAQS), Second External Review Draft

Dear Chairman Frey and CASAC Panel Members,

The purpose of reviewing the 2008 National Ambient Air Quality Standards (NAAQS) for ozone, according to the Environmental Protection Agency (EPA), is “to ensure they are scientifically sound and protective of public health and the environment.” To achieve this, the Clean Air Scientific Advisory Committee (CASAC) is tasked with providing independent advice to the EPA Administrator on the technical bases for EPA’s national ambient air quality standards (NAAQS) to either maintain air quality standards and/or prevent significant deterioration of air quality. It is with this meshing of scientific review and anticipated public policy in mind that I wish to offer comments on EPA’s Draft Policy Assessment for the Review of the Ozone National Ambient Air Quality Standards that advocates for CASAC to consider recommending to the Administrator an ozone level in the 70ppb- 60ppb range.

The stated goal of the ozone NAAQS is in part to improve public health. This is a commendable objective and one shared by (South Carolina). However, CASAC must be cognizant of the impact more stringent ozone standards would have on local economies and how those affects impend health on a social, economic, and ecological level. When considering ozone standards, and any possible changes, it is important to note the EPA’s own reports have indicated an overall decline in ozone pollution. Specifically, there has been a decline in the overall concentration level of criteria pollutants for ozone of 25 percent in the past 20 years. This progress has occurred prior to and as we await the full implementation of the existing ozone NAAQS level of 75ppb. Furthermore, this continuing improvement indicates the current standard is working and there is no need for any modification.

EPA’s Draft Policy Assessment does not take into account the reductions in ozone levels as a direct result of existing regulations and those yet to take effect. Dramatic improvements in ozone levels will continue to come from the 75ppb standard that was enacted in 2008. A recommended revision to the ozone NAAQS standard by CASAC to EPA would greatly increase the stringency of the ozone regulation at a time when implementation of existing standards is already resulting in noticeable progress and would only undermine the efforts of counties and states focused on addressing existing ozone standards. Counties and states need some predictability in order to develop long range plans to achieve ozone reduction. Pushing the goal post back disallows state and local entities the time and flexibility needed to implement already existing ozone standards. Changing the standard does not help counties meet existing ozone standards, but forces them to take two steps back as they fall further out of compliance with federal Clean Air Act requirements.

Additionally, I'm aware of ozone testing in highly rural areas where little or no industry exists. These areas with heavy pine growth have naturally occurring ozone levels well above coastal plain areas. Reducing the ozone standard further will force many of these areas into non-attainment status from just natural ozone concentrations. As such, I also suggest that EPA consider regional ozone standards focusing on reducing levels of manmade pollution including pollution control equipment (such as oxidizers) that contribute to ozone creation.

EPA should also allow states to consider alternative controls for control equipment such as oxidizers that contribute to ozone creation. I know this has been done to a small extent in the Atlanta, Georgia area. Additionally, the decrease in oxidizer use would also curb greenhouse gas emissions. In several industries, EPA mandated oxidizers and other pollution control equipment makeup 60 to 70 percent of greenhouse gas emissions. Alternative controls often exist but may not meet specific regulatory requirements because of the rigidity of the rulemaking process.

In conclusion, I urge CASAC to take notice of the current progress that has been and will be made in cutting the overall levels of ozone before recommending public policy to the EPA Administrator that will result in further harmful regulation that would run the risk of diluting current compliance efforts. I remain committed to helping to achieve a cleaner environment through the continuation of proven technological and regulatory efforts, but to do this the current standard of 75ppb should be allowed to further reduce ozone.

For these reasons, I strongly urge that any recommendation to EPA to tighten the ozone standard should at minimum include the 75ppb standard within the range of consideration.

Sincerely,

/s/

Phil Towles